

REMARKS/ARGUMENTS

In this reply, Claims 1, 8, 11, and 26 are amended. Claim 35 is added. Therefore, Claims 1 and 3-35 are pending in the application. The amendments to the claims as indicated herein do not add any new matter to this application. Furthermore, amendments made to the claims as indicated herein have been made to exclusively improve readability and clarity of the claims and not for the purpose of overcoming alleged prior art.

Claims 1, 2-6, 26-31 and 33 stand rejected under 35 U.S.C. § 102(e) as being allegedly anticipated by US Publication No. 2002/0186653 to Jensen. These rejections are respectfully traversed.

Claim 1 recites, inter alia, a cluster comprising a first switch device, a plurality of active routers, one or more standby routers, and a second switch device. Conversely, Jensen only discloses a single switch 110. The paragraphs of Jensen (paragraphs 7, 10, lines 18-22; paragraphs 12, 13, lines 8-18) cited in the Office Action (page 4, section 4) explicitly recite the switch 110 only in the singular. Having multiple switches within a cluster is significant for at least the reason that the switches that are members of a cluster may be connected to different networks (Applicant's specification, paragraph [0007]).

Further, Claim 1 recites an approach in which a single console control point for a network device cluster receives user input specifying an operation to perform on the cluster as a whole. The operation is then automatically performed on one or more of the active routers in the cluster by transforming the specified operation into one or more device-specific operations for each of the one or more active routers. The user input can specify a configuration command for the cluster as a whole and the configuration command is automatically communicated to each of the active routers in the plurality of active routers. Such an approach is not disclosed or suggested by Jensen.

For at least the above reasons, the rejections of Claims 1, 2-6, 26-31 and 33 under 35 U.S.C. § 102(e), as well as all claims dependent therefrom, are invalid and should be withdrawn.

Claims 11-23 stand rejected under 35 U.S.C. § 103 as being unpatentable over U.S. Patent No. 6,636,239 to Arquie in view of Jensen. These rejections are respectfully traversed.

Adapting Jensen to have the user interface of Arquie still does not address the fact that the cluster disclosed in Jensen does not have first and second switches.

Further, Arquie's FIGS. 3-5, 6, and 8 all disclose a switch group 1 and a switch group 2, which could arguably be said to correspond with the claimed clusters. However, each switch group of Arquie only shows a single switch, and not the claimed first and second switch devices. Additionally, the switches from each of Arquie's switch groups are directly connected to each other, as shown in FIGS. 3-5, 6, and 8. No routers are shown between the switches. Indeed, Arquie does not mention routers at all.

Additionally, from Applicant's FIGS. 1A, 6, and 8 it is apparent that the switches are on the outside of the cluster, and the routers are on the inside. This is significant because the first and second switches may be connected to different networks (applicant's specification, paragraph [0007]). Newly added Claim 35 addresses this subject matter.

Meanwhile, as stated, Jensen's cluster discloses only a single switch 110 that is connected to a single network 102.

For at least the above reasons, the rejections of Claims 11-23 stand rejected under 35 U.S.C. § 103, as well as all claims dependent therefrom, are invalid and should be withdrawn.

All remaining Claims were rejected using Jensen as a base reference. However, all of these Claims either explicitly recite or depend from other Claims which recite elements or steps which as shown above are neither disclosed nor suggested by any combination of prior art, either

by Jensen or by any other reference. The secondary references do not cure this deficiency of Jensen, and therefore any combination of Jensen with any of the secondary references cannot provide the complete combination of features recited in the remaining claims.

For the reasons set forth above, it is respectfully submitted that all of the pending claims are now in condition for allowance. Therefore, the issuance of a formal Notice of Allowance is believed next in order, and that action is most earnestly solicited.

The Examiner is respectfully requested to contact the undersigned by e-mail or telephone if it is believed that such contact would further the examination of the present application. As per MPEP Chapter 5, Applicant understands that Internet communications may not be secure.

Please charge any shortages or credit any overages to Deposit Account No. 50-1302.

Respectfully submitted,

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